



National Wildlife Federation

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POSTAL REGULATORY
COMMISSION
OFFICE OF THE SECRETARY

September 14, 2017

Postal Regulatory Commission
901 New York Avenue, N.W., Suite 200
Washington DC 20268

Re: Docket No. RM2017-12, *Periodic Reporting (Proposal Eight)*

Dear Chairman Taub and Members of the Commission:

My name is Sandra Maio. I am Director of Membership for the National Wildlife Federation ("NWF"). This letter provides the comments of NWF in this case. For the reasons explained here, NWF respectfully requests that the Commission reject the Postal Service Proposal Eight.

NWF is a charitable organization exempt from federal income tax under Internal Revenue Code Section 501(c)(3), and is headquartered in Reston, Virginia. NWF's mission is to unite all Americans to ensure that wildlife thrive in a rapidly changing world. Since 1936, the NWF has joined with people across the country to share knowledge and resources in a common effort to protect wildlife, special places, and natural resources. Protecting these resources is a cause that has long united Americans from all walks of life and political stripes. All Americans, regardless of location, depend on clear air, clean water, and a healthy environment. NWF takes pride in defending those needs.

NWF's past and current efforts have involved saving wetlands, creating wilderness areas, and protecting wildlife habitats, encouraging children to be active outdoors, and finding solutions to the climate crisis.

NWF's wildlife preservation efforts include dealing with warming climate, protecting endangered species, containing the spread of invasive species, creating safe corridors for wildlife, keeping common species common with state wildlife action plans, restoring bison to the Great Plains and advancing red wolf recovery.



Uniting all Americans to ensure wildlife thrive in a rapidly changing world.

nwf.org

NWF works to protect, maintain and restore healthy habitats around waters, coasts and floodplains, gulf restoration, public lands, tribal lands, forest and farms. NWF advocates for federal and state policies that will improve wildlife conservation on hundreds of millions of acres of public, tribal and private lands, including thousands of miles of streams, rivers, lakes and coastlines. NWF also encourages Congress to appropriate adequate funds for natural resources and encourages federal agencies to include climate science in their wildlife conservation management plans. By supporting wildlife conservation, including habitat protecting, NWF seeks to save thousands of species, protect biodiversity, and avoid expensive emergency recovery measures.

Connecting people with nature is an increasingly important mission for NWF. NWF connects Americans adults and children to the outdoors through Garden for Wildlife™, Eco-Schools USA environmental education initiative, Earth Tomorrow®, and many other programs.

NWF is also committed to fighting climate change, the greatest current threat to American wildlife, wild places and communities. Failure to arrest global warming could cause breeding ground for ducks in the American heartland to dry up, moose in New England to be lost to parasites, western forests to burn more often, and Appalachian streams to become inhospitable to trout. NWF is working to reduce greenhouse emissions throughout the country by promoting a rapid transition to clean energy. NWF also works with farmers and ranchers to adopt agricultural practices that protect wildlife, reduce emissions, and store carbon.

Mail plays a vital role in NWF's mission. We rely on direct mail to raise money and awareness. NWF mails 46,000,000 pieces of direct mail annually, mostly at nonprofit Marketing Mail rates.

The last few years have been especially difficult for NWF. Between 2012 and 2016, NWF's overall revenues decreased each year by an average of nearly five percent. Financial pressures have forced NWF to cut or limit staff, reduce program activities, and limit our publication and direct mail volume.

Adoption of Postal Service Proposal Eight would badly harm NWF and its nonprofit mission. The Postal Service acknowledged that the proposal would cause regular nonprofit Marketing Mail rates to increase by 6.9 percent above the Consumer Price Index. An increase of this magnitude would force NWF to reduce the quantity of mail for its fundraising appeals and

switch to alternative channels of fundraising. This would greatly impair NWF's effectiveness: direct mail fundraising still reaches many households more effectively than alternative channels such as telemarketing and the internet. Increases in postage thus could impair the cleanliness, safety, and beauty of the outdoors and its wildlife for future generations.

Phasing over several years the rate increases required by the proposal would merely delay but not eliminate the impairment of NWF's mission, and the harms to those who work and make it their life goal to better the world for wildlife. In the end, government spending to protect wildlife, public lands, and the environment would need to increase to offset the diminished effectiveness of NWF and other conservation organizations. This would have drastic effects for our environment, wildlife and America.

Very truly yours,

A handwritten signature in black ink that reads "Sandra Miao". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Sandra Miao

National Wildlife Federation